



U.S. Department of Justice

United States Attorney  
Southern District of New York

# MEMO ENDORSED

## BY ECF AND EMAIL

The Honorable Valerie E. Caproni  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

The Jacob K. Javits Federal Building  
26 Federal Plaza, 37th Floor  
New York, New York 10278

August 5, 2025

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 8/6/2025

Re: *United States v. Adama Sow, 23 Cr. 593 (VEC)*

Dear Judge Caproni:

The Government writes to respectfully request that Exhibit C to the Government's August 5, 2025 letter be filed under seal. The Exhibit is a set of invoices for work performed by Allegiance Protection Group and IP House for services provided to luxury goods brands (the "Victim Brands") whose false trademarks appeared on certain counterfeit goods trafficked by the defendant. The Exhibit contains sensitive business information and information about confidential investigative activities undertaken on behalf of the Victim Brands. Accordingly, the Government submits that the protection of the Victim Brands' information overcomes the presumption of public access to the Exhibits. *See, e.g., United States v. Belfort*, No. 98 Cr. 859, 2014 WL 2612508, at \*3 (E.D.N.Y. June 11, 2014) (holding that protecting fraud victims' privacy, "present[ed] a strong countervailing interest to the presumption of access" to a document containing information about victims' identities and restitution entitlements). The defendant consents to this request.

Respectfully submitted,

JAY CLAYTON  
United States Attorney

By:

Sarah Mortazavi / Henry L. Ross  
Assistant United States Attorneys  
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Application GRANTED.

SO ORDERED.

*Valerie Caproni*  
8/6/2025

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE

cc: Justine Harris, Esq. (by ECF and Email)